

REMARKS

This amendment is submitted in reply to the Office Action dated November 9, 2007. Claims 1-18 currently stand rejected. Applicants have amended independent claims 8 and 14 to more particularly distinguish the claimed invention from the cited references. Claims 1-7, 9 and 16 have been canceled, without prejudice. No new matter has been added by the amendment.

In light of the amendment and the remarks presented below, Applicants respectfully request reconsideration and allowance of all now-pending claims of the present application.

Claim Rejections - 35 USC §103

Claims 1-18 currently stand rejected under 35 U.S.C. §103(a) as being unpatentable over Dutta et al. (U.S. Patent No. 6,615,212, hereinafter “Dutta”) in view of Melzer et al (U.S. Patent No. 6,226,675, hereinafter “Melzer”). As indicated above, claims 1-7, 9 and 16 have been canceled, and thus the rejections of these claims are now moot.

Independent claim 8 has been amended to clarify that the parser front end determines the type of operation requested by the external device. Independent claim 14 has also been amended to include such a determination as provided in independent claim 8 following the above described amendment. Applicants respectfully submit that this feature, which was previously recited in claims 9 and 16, respectively, is not taught or suggested by the cited references, either alone or in combination.

Dutta includes no disclosure related to a parser front end. Meanwhile, Meltzer, which discloses a parser, fails to specifically disclose determining a type of operation requested by an external device. Instead, module 401, which is asserted on page 8 of the Office Action to correspond to Applicants’ parser front end, only identifies a document type. In this regard, module 401 performs one single operation (identifying document type) instead of determining which type of operation is to be performed. Determining a type of document is not the same as determining a type of operation. Since the identification of a document type is merely one fixed operation, Melzer fails to disclose any determination with respect to the type of operation requested. Thus, Melzer fails to teach or suggest that the parser front end determines the type of

operation requested by the external device as recited in independent claim 8 and similarly described in independent claim 14.

In addition to the distinguishing feature above, Applicants respectfully submit that there are other features of the claimed invention that are lacking from Dutta and Melzer. In this regard, for example, independent claim 8 recites an internal web server. On page 5, the Office Action initially refers to originating server 614 of Figures 6 and 7 of Dutta as corresponding to Applicants' external device. Subsequently on page 7, the Office Action refers to the same originating server as corresponding to Applicants' internal web server. Since the originating server cannot logically be both the external device with which the XML interface communicates and an internal server, Dutta fails to teach or suggest the claimed gateway device because the originating server of Dutta cannot be both internal (e.g., corresponding to the internal web server) and external (e.g., corresponding to the external device). Additionally, Meltzer does not include a disclosure related to an internal server and therefore fails to cure the deficiency of Dutta with respect to the internal web server. Accordingly, independent claim 8 is also patentable over the combination of Dutta and Melzer at least for the additional failure of Dutta and Melzer to disclose an internal web server and external device in the manner provided in the claimed invention.

Since both Dutta and Melzer fail to teach or suggest the features described above of the respective independent claims of the claimed invention, any combination of Dutta and Melzer also fails to teach or suggest the respective features of independent claims 8 and 14 described above. Accordingly, independent claims 8 and 14 are patentable over Dutta and Melzer, either alone or in combination. Claims 10-13, 15, 17 and 18 depend either directly or indirectly from independent claims 8 and 14, respectively, and thus include all the recitations of their respective independent claims. Thus, dependent claims 10-13, 15, 17 and 18 are patentable for at least the same reasons given above for independent claims 8 and 14.

Accordingly, for all the reasons stated above, Applicant respectfully submits that the rejections of claims 8, 10-15, 17 and 18 are overcome.

Appl. No.: 09/693,512
Amdt. Dated 02/08/2008
Reply to Office Action of 11/09/2007

CONCLUSION

In view of the amendments and the remarks submitted above, it is respectfully submitted that the present claims are in condition for immediate allowance. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicant's undersigned attorney to resolve any remaining issues in order to expedite examination of the present invention.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,


Chad L. Thorson
Registration No. 55,675

Customer No. 00826
ALSTON & BIRD LLP
Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
Tel Charlotte Office (704) 444-1000
Fax Charlotte Office (704) 444-1111

ELECTRONICALLY FILED USING THE EFS-WEB ELECTRONIC FILING SYSTEM OF THE UNITED STATES PATENT & TRADEMARK OFFICE ON FEBRUARY 8, 2008.
LEGAL01/13073683v1